



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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March 7, 2011

Mr. Bart Vernace
U.S. Department of Transportation
Federal Aviation Administration
5950 Hazeltine National Drive, Suite 400
Orlando, FL 32822

SUBJECT: Palm Beach International Airport Project, Construction and Operation of
Proposed Airfield Improvements, Funding, Palm Beach County, FL
CEQ Number 20110027

Dear Mr. Vernace:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced FAA Final Environmental Impact Statement (FEIS) for the proposed Airfield Improvement Project (AIP) at Palm Beach International Airport (PBIA) in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Project Description

FAA currently designates PBIA as a "medium-hub primary commercial service airport." A total approaching seven million passengers using 18 different commercial passenger air carriers were accommodated by PBIA in 2006 (project baseline). The current airport runway layout consists of an east-west primary runway (9L/27R) with 10,000-ft x 150-ft dimensions that serves commercial aircraft; a closely-spaced "southern" parallel east-west runway (9R/27L) with 3,210-ft x 75-ft dimensions that serves General Aviation (GA) aircraft; and a north-south crosswind runway (13/31) with 6,932-ft x 150-ft dimensions intersecting the primary runway that serves GA aircraft and commercial aircraft as needed. In essence, however, PBIA operates as a one-runway airport for commercial flights, since the southern runway cannot accommodate commercial airliners, the crosswind intersects with the primary runway, and the parallel runways are only separated by 700 feet. Accordingly, PBIA has two dependent air carrier runways and one dependent GA runway.

Numerous alternatives were screened in the DEIS using a Level 1 (Purpose and Need), Level 2 (Airfield Design Criteria) and Level 3 (Environmental Considerations) evaluation approach. Most offsite alternative modes of transportation, offsite reliever or new airports, and numerous onsite runway configurations were screened out in the process.

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The Sponsor's Proposed Project would extend the length of the southern GA runway (9R/27L) by +4,790 feet (from 3,210 ft to 8,000 ft) and widen it by +75 feet (from 75 ft to 150 ft). This modification would provide PBIA with a second commercial runway parallel to the primary runway to help accommodate additional operations and annual/hourly peak demands for design years 2013 and 2018. In addition, the southern runway would be relocated to the south by 100 feet to attain the minimum FAA centerline separation distance of 800 feet for the operation of commercial aircraft on parallel runways for ARC D-IV airports. After the project, the primary runway would principally serve airport departures while the extended southern parallel runway would principally serve arrivals.

Additional AIP modifications would mainly involve taxiways, the crosswind runway and the Runway Safety Areas (RSA). In addition to also extending associated taxiways to accommodate the proposed new airport configuration, the crosswind runway would be reconfigured, resulting in an overall shorter (4,000 ft) but wider (150 ft) crosswind runway that is decoupled from the primary runway. Moreover, the size of the RSAs at the ends of the southern and the crosswind runways would be made compliant with FAA regulations and airport lighting, navigational aids and other modifications would also be provided. The AIP would also require relocation of a portion (750 ft) of the Airport West Canal, acquisition of 8.5 acres of land, and relocation of some existing airport facilities.

Alternative 2 is similar to the Sponsor's Proposed Project except that it would eliminate the crosswind runway (instead of reconfiguring it) and add another 10,000-ft parallel runway 800 feet north of the primary runway instead of extending the existing southern runway to 8,000 feet. The southern runway would be retained unchanged as a GA runway. From north to south, the three runways for Alternative 2 would become 9L/27R, 9C/27C and 9R/27L.

Remaining comments:

EPA appreciates FAA addressing many of the DEIS comments, however, we continue to have concerns: the increases in noise exposures to residents and the air quality emissions of additional forecasted operations. Direct, indirect and cumulative impacts water quality and environmental justice.

Noise – Aircraft noise exposures were well documented in the FEIS. Exposure levels are predicted for numerous residents living within the 65+ DNL noise contours for 2013 and 2018, including exposure to significant +1.5 DNL and greater increases. No exposure to significant increases (+3.0 DNL or greater) was predicted to residents living within the 60 DNL.

EPA appreciates that noise mitigation was considered in the FEIS and that a number of homes and other sensitive noise receptors within the 65 DNL have already been sound-proofed by the Sponsor through previous efforts. However, if the project is pursued, the mitigation for noise exposures of residents should be substantively further addressed in the FAA Record of Decision (ROD).

We believe that all residents already living within the 65+ DNL noise contours that are

significantly elevated (+1.5 DNL or more) by the proposed project, should be provided with mitigation. We further feel that residents currently living outside the 65 DNL but that would be newly brought into the 65 DNL through a significant noise elevation (+1.5 DNL or more) due to the project should also receive mitigation. To ensure such mitigation, we recommend that the approval of the Airport Layout Plan (ALP) in the ROD be conditioned on appropriate mitigation for those housing units that would experience a +1.5 DNL or greater increase due to the Proposed Project.

A finalized noise mitigation plan should then be documented in the FAA ROD, include FAA and Sponsor commitments, and be made available to all interested parties. Ultimately, the Sponsor (in consultation with FAA) would implement the final mitigation plan before the project is implemented (proposed 2013 start-up), and monitor the implemented measures where appropriate (sound-proofing) to ensure successful noise attenuation.

In regard to types of mitigation measures, EPA prefers that eligible residences be acquired by the Sponsor from willing sellers through direct acquisition or purchase assistance. This would particularly apply for homes located in the higher contours of the 65+ DNL contours. Secondly, we prefer that homes be sound-proofed by the Sponsor. The level of insulation might need to be greater for any residences located in higher contours that were not acquired. In contrast, the use of easements would not mitigate noise exposures or change the land use to be compatible with airports. Overall, the implementation of noise mitigation should be prioritized starting with residences experiencing higher levels and continue toward the 65 DNL.

Air Quality – EPA offers the following summaries for onsite and offsite criteria pollutant National Ambient Air Quality Standards (NAAQS) and Greenhouse Gas (GHG) emissions attributable to the project.

The Proposed Project's and Alternative 2's predicted reduction of average aircraft delay times can be expected to reduce air emissions at PBIA compared to the No Action Alternative. Air emissions at PBIA can be expected to increase during the design period (2013-2018) largely due to the forecasted increase in aircraft operations. The FEIS indicates that these increases are not expected to exceed the NAAQS. However, due to recent changes in the expected implementation timeline for the revised ozone NAAQS occurring before or within the project design period (2013-2018), the ROD should address how increased airport emissions will not adversely impact air quality such that the area will not violate the revised zone NAAQS. Moreover, beyond the design period, we believe that air emissions can be expected to further increase with continued growth in operations that presumably could otherwise not be accommodated without the proposed runway modification. We request that modeling of potential future air emission impacts be addressed in the ROD.

In addition to project reduction of aircraft delay times, EPA recommends overall airport reductions in GHG to further the "greening" of the airport through various measures such as alternative fuels, ground support equipment, auxiliary power units, electrification, idling practices, diesel retrofits, cell phone waiting areas, energy conservation, etc. EPA can assist in the future development of these options.

Water Quality - Airport operations include many activities likely to result in the discharge of pollutants to adjacent water bodies. Those activities include aircraft and airfield fuel storage and refueling, aircraft and vehicle cleaning and maintenance, and construction. These activities are regulated under provisions of the Clean Water Act (CWA).

The CWA prohibits any “point source” (a discrete conveyance such as a drainage ditch, pipe, or other outfall) from discharging pollutants into waters of the United States. The primary mechanism for controlling pollutant discharges is through the administration of the National Pollutant Discharge Elimination System (NPDES) permit program. The NPDES permit program regulates discharges of stormwater and wastewater. Due to the nature of their outdoor operations and because airports are included in one of the industrial categories regulated under the NPDES stormwater permitting program (under the Standard Industrial Classification code “Transportation by Air”), all airports are required to have a stormwater permit. Airports that discharge other wastewater, such as from equipment maintenance and cleaning operations, require an additional NPDES wastewater permit. Discharges associated with stormwater often pose the greatest challenge to airport managers, because airports may be spread out over a wide surface area, with a majority of operations exposed to the elements.

Factors that may affect permit requirements (i.e., appropriate BMPs), include:

- the local climate (dry versus rainy/wet, cold versus warm);
- the type or size of adjacent water bodies — pollutants are diluted depending on the size of the water body receiving the discharge (e.g., a creek or stream versus a river or ocean);
- the water quality of adjacent water bodies — local permitting authorities consider existing pollutant levels when controlling airport discharges; and
- airport size.

EPA recommends the implementation of best management practices (BMPs) that prevent or minimize the discharge of pollutants into a water body (e.g., construction of a stormwater retention pond to prevent stormwater drainage directly into receiving waters).

Socioeconomic Impacts, EJ and Children’s Health

The hardcopy of the FEIS Document that included the Appendices did not include Appendix K (the agency correspondence and response to comments). In the future, the responsiveness summary should be provided to the agency for review in hardcopy format. Additional copies of the document and appendices (i.e. responsiveness summary) may be submitted on CDs or other formats based on the reviewers preferences.

In the DEIS, EPA expressed concerns about a multi-family HUD housing complex that would experience a significant increase in noise as a result of Alternative 2. According to DEIS, there was no buyout or acquisitions proposed. However, EPA noted that other mitigation measures such as soundproofing were mentioned, but were not committed to in the DEIS. EPA appreciates FAA’s FEIS commitment to develop appropriate noise mitigation for the housing

complex should FAA select Alternative 2 as the Preferred Alternative. We recommend that the Record of Decision (ROD) clearly indicate the specific type of noise mitigation that will be used should Alternative 2 be selected. We request a copy of the ROD for our review and files.

EPA noted that the Executive Summary does not provide the percentages of potential EJ populations that would experience significant noise increases resulting from the project. The FEIS response indicated that neither the AIP nor Alternative 2 would result in disproportionately high and adverse environmental effect on minority or low income populations. See Section 5.14 of the FEIS for further information. EPA believes that it is important to disclose the percentages of EJ populations that would experience significant noise increases to ensure that the projects potential effects are transparent and are clearly communicated.

In the DEIS, EPA noted that in the short-term, there should be no significant adverse effect on children's health. However, we indicated that increased air pollutant emissions are expected in the long term due to additional operations and enplanements and that we recommended be re-evaluated as the airport expands or as operations and enplanements. FAA indicated that as a result of the 2009 TAF for PBIA, the Airport Sponsor deemed it necessary to re-evaluate the implementation plan and schedule for the AIP at PBIA. After consultation with the FAA, the Airport Sponsor determined that based on the 2009 TAF, the proposed Runway 10R/28L improvements would not need to be implemented as soon as previously thought. As a result of the revised implementation plan and schedule for the AIP, the FAA has provided an accounting of potential future environmental impacts associated with the Long-Term components of the AIP or Alternative 2 based on the best information currently available. EPA notes that the FAA acknowledges that these conditions may change over time. We support FAA's FEIS commitment to reassess these conditions with additional NEPA analysis when a decision on the Long-Term components of the AIP or Alternative 2 is ready to move forward and the number of aircraft operations at PBIA returns to the levels that would cause unacceptable aircraft operational delay.

Summary

EPA's primary concerns with this project are the increases in aircraft noise exposures to residents and the air quality emissions of forecasted additional enplanements and operations. Direct, indirect (induced) and cumulative impacts are of concern. We find the predicted noise exposure levels for local residents due to the project to be significant for both the evaluated Proposed Project and Alternative 2 for both design years. Regarding noise mitigation, EPA believes that the proposed FAA position for this project has merit but should be expanded.

Regarding air quality, EPA is pleased that the predicted reduction of average aircraft delay times for both considered alternatives can be expected to reduce air emissions at PBIA compared to the No Action Alternative. However, largely due to forecasted increases in aircraft operations, the FEIS indicates that criteria-based air emissions at PBIA can be expected to increase during the project design period (2013-2018), even though the FEIS indicates that these increases are not expected to exceed the NAAQS. Nevertheless, due to recent changes in the expected implementation timeline for the revised ozone NAAQS occurring before or within the

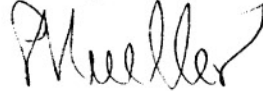
project design period, the ROD should address how increased airport emissions will not adversely impact air quality such that the area will not violate the NAAQS. We request that modeling of potential future air emission impacts be addressed in the ROD.

Regarding water quality EPA recommends the implementation of best management practices (BMPs) that prevent or minimize the discharge of pollutants into a water body (e.g., construction of a stormwater retention pond to prevent stormwater drainage directly into receiving waters).

Regarding EJ EPA recommends that the Record of Decision (ROD) clearly indicate the specific type of noise mitigation that will be used should Alternative 2 be selected. We request a copy of the ROD for our review and files.

We appreciate the opportunity to review the proposed action. Please contact Ken Clark of my staff at (404) 562-8282 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management